

## UNITED STATES DISTRICT COURT

1:25-cv-544

Hala Y. Jarbou  
United States District Judge

## Western District of Michigan – Civil Cover Sheet

SOUTHERN DIVISION

## Plaintiff(s):

Ronald Warren Saunders III  
10442 Tomkinson Dr.  
Scotts, MI 49088

## Defendant(s):

Vivian Williams (aka Vivian Bourland-Williams) - CASE WORKER ALLEGAN COUNTY DHHS  
Matthew Salas - SUPERVISOR ALLEGAN COUNTY DHHS  
Jennifer Wedge - DIRECTOR ALLEGAN COUNTY DHHS  
Allegan County DHHS - STATE AGENCY ACTING UNDER COLOR OF LAW  
Allegan County Prosecutor's Office - County legal office acting under color of authority  
Allegan County, A MUNICIPAL GOVERNMENT ENTITY LIABLE FOR ACTIONS OF ITS AGENTS  
et al.

## Basis of Jurisdiction:

Federal Question (U.S. Government Not a Party)  
U.S. Government Plaintiff  
U.S. Government Defendant

## Nature of Suit:

Civil Rights - 1983 Other Civil Rights  
Civil Rights - 1983 Due Process  
Other - Title IV-D / IV-E Violations  
Other - Federal Protective Writ

## Origin:

Original Proceeding

## Cause of Action:

42 U.S.C. § 1983; 28 U.S.C. § 1651; 42 U.S.C. §§ 651, 670

## Requested in Complaint:

Monetary Relief (\$75,000)  
Injunctive Relief  
Declaratory Judgment  
Emergency Protective Writ  
DOJ / OIG Referral



Signature of Attorney of Record:

Pro Se Plaintiff: Ronald Warren Saunders III

Date: May 9, 2025

Ronald Warren Saunders III  
10442 Tom Kinson DR  
Scotts MI 49098  
269-394-0951

# UNITED STATES DISTRICT COURT

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Western District of Michigan  
Southern Division

Ronald Warren Saunders III,  
Plaintiff,

v.

Vivian Williams (aka Vivian Bourland-Williams),  
Matthew Salas,  
Jennifer Wedge,  
Allegan County DHHS,  
Allegan County Prosecutor's Office,  
Allegan County,  
et al.,  
Defendants.

## **COMPLAINT FOR DAMAGES, INJUNCTIVE RELIEF, AND FEDERAL PROTECTION**

### **I. JURISDICTION AND VENUE**

1. This Court has jurisdiction under 28 U.S.C. § 1331 and 42 U.S.C. § 1983 for claims arising from violations of the U.S. Constitution, including the First, Fourth, and Fourteenth Amendments.
2. Venue is proper in this district under 28 U.S.C. § 1331(b) because the acts and omissions giving rise to this complaint occurred in Allegan County, within the Western District of Michigan, Southern Division.

### **II. PARTIES**

3. Plaintiff Ronald Warren Saunders III is a resident of Kalamazoo County, Michigan, and is the biological and legal custodial father of Camellia Jean Weaver.
4. Defendants are agents of Allegan County and its departments, acting under color of state law.

### III. STATEMENT OF FACTS

5. Plaintiff has full legal custody of his daughter per notarized Affidavit of Parentage and DNA confirmation.
6. Despite valid custody, Defendants refused to release medical records, misclassified Plaintiff as a respondent, and enabled placement of CJ with known offenders.
7. Vivian Williams gave false testimony under oath, claiming no request for CJ's SSN was made—contradicted by emails and text messages.
8. Defendants used DHHS and court proceedings to obstruct Plaintiff's legal standing and ignore Kalamazoo County jurisdiction.
9. Therapeutic documents confirmed trauma and abuse, yet Defendants suppressed findings, falsified reports, and funded reunification attempts using federal Title IV-D and IV-E programs.

### IV. CLAIMS FOR RELIEF

COUNT I – Violation of Fourteenth Amendment Due Process

COUNT II – Fraud Upon the Court (Hazel-Atlas Glass Co. v. Hartford-Empire Co.)

COUNT III – Civil Rights Violations under 42 U.S.C. § 1983

COUNT IV – Gross Negligence and Child Endangerment (DeShaney v. Winnebago County)

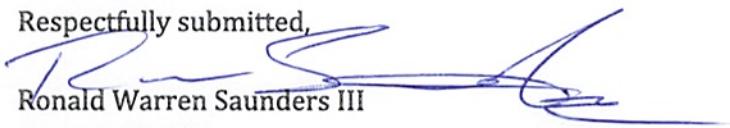
COUNT V – Retaliation and Intimidation (Nieves v. Bartlett; Camara v. Municipal Court)

COUNT VI – Title IV-D and IV-E Violations (42 U.S.C. §§ 651, 670)

### V. RELIEF REQUESTED

Plaintiff requests this Court to:

1. Award damages in the amount of \$75,000;
2. Issue injunction prohibiting further interference in custody;
3. Order immediate release of CJ's insurance and identification records;
4. Refer misconduct to DOJ/OIG and order federal oversight;
5. Stay of any pending state or administrative proceedings affecting CJ until this case is resolved;
6. Grant any further relief deemed just and proper.

Respectfully submitted,  
  
Ronald Warren Saunders III

Pro Se Plaintiff

Date: May 09, 2025

Ronald Warren Saunders III  
10442 Tomkinson DR  
Scotts MI 49088  
269-394-0951

**UNITED STATES DISTRICT COURT**

**Western District of Michigan**

**EMERGENCY PROTECTIVE WRIT AND DEMAND FOR STAY OF ACTIONS AGAINST  
MINOR CHILD**

Filed in conjunction with:

Ronald Warren Saunders III v. Allegan County DHHS, et al.

U.S. District Court, Western District of Michigan

Date: May 09, 2025

**I. INTRODUCTION**

This Emergency Writ is brought pursuant to 28 U.S.C. § 1651 (All Writs Act) and 28 U.S.C. §§ 2201–2202 (Declaratory Judgment Act) to secure immediate federal protection over the minor child, Camellia Jean Weaver, from any and all further state, agency, or jurisdictional actions pending final resolution of the above-referenced civil rights case.

**II. GROUNDS FOR PROTECTIVE WRIT**

- Plaintiff, Ronald Warren Saunders III, has full legal and physical custody of Camellia Jean Weaver pursuant to standing orders of the Kalamazoo County Family Court.
- Allegan County DHHS has initiated actions and hearings absent jurisdiction and in contradiction to existing custody orders.
- Multiple agents, including Vivian Williams and others, have presented false statements, backdated correspondence, and obstructed access to identity and insurance records for the child.
- A civil rights lawsuit under 42 U.S.C. § 1983 is currently active, alleging fraud, retaliation, and denial of due process.
- Any attempt by Allegan County, DHHS, or CPS to remove, interfere with, or initiate contact with the minor child constitutes unlawful interference and obstruction of federal remedy.

**III. PRAYER FOR RELIEF**

- Issue a federal Protective Writ under 28 U.S.C. § 1651 barring further administrative or legal action affecting custody, visitation, or medical access related to Camellia Jean Weaver.
- Stay all current or future hearings initiated by Allegan County or DHHS until resolution of the pending federal civil rights complaint.
- Declare that Plaintiff maintains lawful custody and that all conflicting jurisdictional claims are federally preempted under active review.
- Grant any additional relief this Court deems just and proper in the interest of constitutional protections, parental rights, and child safety.

Respectfully submitted,  
Ronald Warren Saunders III  
Pro Se Plaintiff

  
Ronald Warren Saunders III  
10442 Tankinson DR  
Scotts MI 49088  
269-394-0951

# DOJ and OIG FEDERAL REFERRAL – Allegan County DHHS

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## Summary of Complaint

This referral is submitted to the United States Department of Justice and the Office of the Inspector General to report gross misconduct, systemic fraud, and civil rights violations committed by Allegan County DHHS. These violations directly involve Title IV-D and Title IV-E program abuse, suppression of abuse disclosures, procedural fraud, and retaliation against a custodial father protecting his daughter.

## Allegations and Supporting Facts

1. Plaintiff is the legal and biological father of Camellia Jean Weaver, confirmed via notarized Affidavit of Parentage and DNA testing.
2. Allegan County DHHS refused to honor or recognize the AOP, delayed insurance access, and denied the Plaintiff medical records for CJ.
3. Reunification efforts were maintained despite confirmed trauma reports and disclosures of sexual abuse involving Jacob Beary.
4. Falsified court documents and perjury were used to justify a Show Cause hearing against a non-respondent parent.
5. Police were used to intimidate and pressure Plaintiff during illegal DHHS field visits.
6. DHHS staff enabled access to medical records for a non-custodial parent without court authorization.
7. Children were placed in homes with known abusers under falsified 'non-fictive kin' designations to qualify for federal IV-E reimbursement.

## Programs and Statutes Affected

- Title IV-D (42 U.S.C. § 651 et seq.) – Child support enforcement and custodial tracking.
- Title IV-E (42 U.S.C. § 670 et seq.) – Foster care, trauma-based intervention, and abuse protection.
- 42 U.S.C. § 1983 – Civil rights violations under color of state law.
- HIPAA Privacy Rule – Unauthorized medical record disclosure.
- 18 U.S.C. § 1001 – False statements in government filings.
- 18 U.S.C. § 1341/1343 – Mail and wire fraud for federal benefit claims.

## Relief and Enforcement Request

Plaintiff requests:

1. Formal DOJ and OIG investigation into Allegan County DHHS and associated personnel.
2. Immediate review of all federally funded placements involving Camellia Jean Weaver.
3. Revocation of reimbursement claims based on fraudulent non-fictive kin designations.
4. Federal monitoring of Allegan DHHS operations until the completion of investigation.
5. Civil and criminal liability review for Vivian Williams, Jennifer Wedge, Matthew Salas, and legal counsel who knowingly upheld false filings.

Respectfully submitted,

Ronald W. Saunders III

Date: May 01, 2025



Ronald Warren Saunders III

10442 Tomkinson Dr

Scotts MI 49088

269-394-0951

# **TITLE IV-D and IV-E FEDERAL VIOLATION BRIEF**

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**Filed by: Ronald Warren Saunders III**

**Date: May 01, 2025**

**Jurisdiction: United States District Court / Michigan State Court**

## **Introduction**

This document supports the civil complaint filed by Ronald Warren Saunders III and outlines specific violations of federal statutes governing child support enforcement (Title IV-D) and foster care/child welfare funding (Title IV-E). Defendants, including Allegan County DHHS and associated personnel, utilized federal programs to interfere with custodial rights, misappropriate funding, and obstruct lawful parenting actions.

### **Title IV-D Violations – 42 U.S.C. § 651 et seq.**

Under Title IV-D, state agencies are federally funded to enforce child support and maintain accurate custodial records. DHHS failed to:

1. Recognize and enforce a legally filed Affidavit of Parentage.
2. Acknowledge existing legal custody and paternity verification.
3. Maintain accurate child support status and falsely represented the Plaintiff as a respondent or obstructive party.
4. Use IV-D processing authority to justify interference without legal jurisdiction.

These misrepresentations were then used to justify service plans and court hearings—constituting misuse of IV-D authority.

### **Title IV-E Violations – 42 U.S.C. § 670 et seq.**

Title IV-E governs foster care placement, reimbursement, and permanency planning.

Violations include:

1. Placing CJ in active danger while falsely marking the placement as federally compliant.
2. Classifying non-legal parties as 'fictive kin' to qualify for IV-E placement reimbursement.
3. Falsifying permanency reports by omitting known trauma, abuse disclosures, and therapist-confirmed sexual abuse.
4. Continuing federally reimbursed contact with an unfit parent, in violation of permanency safety requirements.

These actions violate federal mandates for reasonable efforts and fraudulently claim federal reimbursement.

### Conclusion and Referral Basis

The use of Title IV funding to carry out documented obstruction, child endangerment, and judicial fraud is a federal offense. This document will accompany DOJ and OIG complaints as evidence of fraud, misuse of federal resources, and violation of the Social Security Act.



Ronald Warren Saunders ~~to~~

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